ICC Docket 06-0027 Exhibit 2 AG Response to ATT IL Petition for Interlocutory Review

## <u>Line Count in the Record and in ATT IL Stricken Exhibits and Schedules</u> (Redacted)

	E911	LWC	UNE-P	Resale	ATT CLEC	Total CLEC Lines	Total CLEC Lines Excluding ATT	Total Residentia 1 Lines (ILEC and CLEC)
Dec. 2004 - IBT Data, Data Net Systems Ex. 3	285,015		293,503	4,848	***  ***  ATT IL  Ex. 1.5,  Sch.  WKW-  JP-R2  (stricken)	953,030 or 28% per ICC Report (ATT IL Ex. 1.0, Sch. WKW 7)  795,584 or 24.5% per ATT IL Ex. 1.5, Sch. WKW-JP-R2 (stricken)	583,366	
Sept. 2005 - IBT data, ATT IL Ex. 1.0, Sch. WKW-5	279,008	16,561	215,360	5,158	***	678,940 or 17% excluding ATT)	516,087	

Dec. 2005 - IBT data, ATT IL Ex. 1.1, Sch. WKW-R1	295,574	110,691	90,187	6,002	<b>502,454</b> or <b>16.4%</b>	502,454	
March 2006-IBT data, ATT IL Ex. 1.5, Sch. WKW-JP- R1& fn 1. (stricken)	315,670	110,924 (or 151,479)	82,084 (or 41,529)	6,320	<b>514,998</b> or <b>16.88%</b>	514,998	3,050,141

<sup>\*</sup> Staff witness Dr. Zolnierek and AG witness Dr. Selwyn reported CLEC lines as only 13.3% of total residential lines on December 31, 2005, based on data provided by CLECs. As explained in the testimony, there is a major discrepancy between the E911 data provided by IBT and the CLEC data, reflecting at least the difference between circuit switched cable lines and VoIP lines, which are provided by Comcast for \$39.99 to \$54.95 (depending on extent of bundling) and include many services that are not the subject of this investigation, such as long distance, toll, voice mail, and vertical features (other than Caller-ID and Call Waiting).

This discrepancy in the E911 data was not subject to review for the March 31, 2006 that IBT sought to include in the record, so it was impossible, in the time available, verify this data.